#### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

CARLA CALOBRISI,	)
Plaintiff,	)
v.	) Case No. 1:14-cv-00996 (AJT/TRJ)
BOOZ ALLEN HAMILTON INC.,	)
Defendant.	)

# DEFENDANT BOOZ ALLEN HAMILTON INC. AND NON-PARTIES DEBORAH SHERMAN AND ROBIN SHAFFERT'S MOTION TO QUASH AND/OR IN THE ALTERNATIVE FOR ENTRY OF A PROTECTIVE ORDER RELATING TO DEPOSITION SUBPOENAS ISSUED BY PLAINTIFF

COME NOW Defendant Booz Allen Hamilton Inc. ("Booz Allen") and Non-Parties Deborah Sherman and Robin Shaffert, by counsel, and pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure, hereby file this Motion to Quash and/or in the Alternative for a Protective Order Relating to Deposition Subpoenas issued by Plaintiff.

As set forth in the attached supporting Memorandum, Defendant and Non-Parties Deborah Sherman and Robin Shaffert request this Court to quash the subpoena served on Deborah Sherman and Robin Shaffert or, in the alternative, to enter a Protective Order to preclude Plaintiff from taking their depositions.

As detailed in the attached supporting Memorandum, Defendant's counsel conferred with Plaintiff's counsel numerous times via email between December 22, 2014 and January 15, 2015, but the parties were unable to resolve this matter without the Court's intervention.

### ROBIN SHAFFERT AND DEBORAH SHERMAN NON-PARTIES By Counsel

/s

Stephen W. Robinson (Va. Bar No. 15337)
Melissa L. Taylormoore (Va. Bar No. 75506)
Sarah A. Belger (Va. Bar No. 67947)
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## BOOZ ALLEN HAMILTON INC. By Counsel

/s/

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 16, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following counsel of record. I further certify that a true copy of foregoing will also be served via electronic mail upon:

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And I hereby certify that on January 16, 2015, I will serve a true copy of the following via electronic mail upon the following non-filing user:

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